

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

United States of America)	
)	
v.)	No. 21-cr-41-JL
)	
Ian Freeman)	
Aria DiMezzo)	
_____)	

UNITED STATES' BILL OF PARTICULARS
FOR FORFEITURE OF ASSETS

The United States of America, by and through its attorney, Jane E. Young, hereby files the following Bill of Particulars for Forfeiture of Assets.

Pursuant to 18 U.S.C. §§ 981(a)(1)(C), 982(a)(1) and (2), and 28 U.S.C. § 2461(c), the Superseding Indictment's Notice of Forfeiture seeks the forfeiture of any property, real or personal, which constitutes or is derived from proceeds traceable to violations of 18 U.S.C. § 371; any property, real or personal, constituting or derived from, proceeds obtained, directly or indirectly as a result of violations of 18 U.S.C. §§ 1343, 1344 or 1349; and all property, real or personal, involved in violations of 18 U.S.C. §§ 1956, 1957 or 1960, and all property traceable to such property. DN 139.

In addition to the properties listed in the Notice of Forfeiture (*Id.* at 14-19), the following property is also subject to forfeiture: (22-FBI-006754) 5.24279401 Bitcoin currently restrained in Blockchain Access UK Ltd user account 995c854f-7674-42ec-b465-43373a415ee5, in the name of Ian Freeman.

Upon conviction, Defendants' interest in this property shall be forfeited; claims of any nominal owners are subject to the ancillary petition procedures set forth in Criminal Rule 32.2 and 21 U.S.C. § 853.

This Bill of Particulars is not intended to limit the United States to forfeiture only of those items listed in the Superseding Indictment and this Bill; if further assets become known to the United States prior to resolution of the forfeiture matters in this case, the United States will so advise the Court and defense counsel.

JANE E. YOUNG
United States Attorney

Dated: September 29, 2022

By: /s/ John J. Kennedy
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